

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In re: BAIR HUGGER FORCED AIR
WARMING DEVICES PRODUCTS
LIABILITY LITIGATION

MDL No. 15-2666 (JNE/FLN)

This Document Relates To:

**WORD COUNT COMPLIANCE
CERTIFICATE**

All Actions

I certify that Defendants' Memorandum in Opposition to Plaintiffs' Motion Seeking *In Camera* Review of Ten Documents Withheld Under Claims of Privilege complies with the length limitations set forth in LR 7.1(f), as well as the type size requirements set forth in LR 7.1(h).

I further certify that in preparation of this memorandum, I used Microsoft® Office Word 2013, and the word processing program has an appropriate functioning word count tool applied specifically to include all text, including headings, footnotes, and quotations.

I certify that the above-referenced memorandum contains 3,240 words.

Dated: March 12, 2018

Respectfully submitted,

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